

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY  
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ELECTRONICALLY FILED  
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DATE FILED: 8/20/21

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UNITED STATES OF AMERICA

-v.-

: CONSENT PRELIMINARY ORDER  
OF FORFEITURE/  
: MONEY JUDGMENT

MARIO ALVARENGA,

: S4 15 Cr. 627 (ER)

Defendant.

- - - - - x

WHEREAS, on or about March 16, 2016, MARIO ALVARENGA (the "defendant"), was charged in a five-count Indictment, S4 15 Cr. 627 (ER) (the "Indictment"), with conspiracy to commit wire fraud and bank fraud, in violation of Title 18, United States Code, Section 1349 (Count One) and conspiracy to commit bank fraud (Count Five);

WHEREAS, the Indictment included a forfeiture allegation as to Counts One and Five, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461, of any and all property constituting and derived from any proceeds the defendant obtained directly or indirectly as a result of the commission of the offense charged in Count One of the Indictment;

WHEREAS, on or about November 3, 2016, the defendant pled guilty to Counts One and Five of the Indictment and admitted the forfeiture allegation with respect to Counts One and Five of the Indictment; and

WHEREAS, the defendant consents to the entry of a money judgment in the amount of \$189,000 in United States currency, representing the amount of proceeds traceable to the offense charged in Counts One and Five of the Indictment;

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Audrey Strauss, United States Attorney, Assistant United States Attorney Sheb Swett, of counsel, and the defendant, and his counsel, Scott Druker, Esq. that:

1. As a result of the offense charged in Counts One and Five of the Indictment, to which the defendant pled guilty, a money judgment in the amount of \$189,000 in United States currency (the "Money Judgment") shall be entered against the defendant. This forfeiture obligation shall be joint and several with any such obligations entered against the defendant's co-conspirators, AMIR MEIRI, RAJESH MADDIWAR, CHRISTINE MAHARAJ, SAMANTHA BOUBERT, OWEN REID, and HERZEL MEIRI charged in United States v. MARIO ALVARENGA, et al., 15 Cr. 627 (ER).

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the defendant,

MARIO ALVARENGA, and shall be deemed part of the sentence of the defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding Money Judgment shall be made by postal money order, bank or certified check, made payable, in this instance to the "United States Marshals Service", and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Asset Forfeiture Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the defendant's name and case number.

4. Upon execution of this Consent Preliminary Order of Forfeiture/Money Judgment, and pursuant to 21 U.S.C. § 853, the United States Marshals Service shall be authorized to deposit the payments on the Money Judgment in the Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, upon entry of this Consent Preliminary Order of Forfeiture/Money Judgment, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of

documents and the issuance of subpoenas, pursuant to Rule 45 of the Federal Rules of Civil Procedure.

6. This Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2(e) of the Federal Rules of Criminal Procedure.

7. The Clerk of the Court shall forward three certified copies of this Consent Preliminary Order of Forfeiture/Money Judgment to Assistant United States Attorney Jason Cowley, Chief, Money Laundering and Asset Forfeiture Unit, United States Attorney's Office, One St. Andrew's Plaza, New York, New York 10007.


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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

AUDREY STRAUSS  
United States Attorney for the  
Southern District of New York


By:   
SHEB SWETT  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-6522

8/20/2021  
DATE

CHRISTINE MAHARAJ

By:   
MARIO ALVARENGA

8/20/21  
DATE

By:   
SCOTT DRUKER, ESQ.  
Attorney for Defendant  
1325 Franklin Avenue  
Suite 225  
Garden City, NY 11530

8/20/21  
DATE

SO ORDERED:

  
HONORABLE EDGARDO RAMOS  
UNITED STATES DISTRICT JUDGE

8/20/2021  
DATE